

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,

v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF KARIN WULF

I, Karin Wulf, declare as follows:

1. I am the Director and Librarian of the John Carter Brown Library and a Professor of History at Brown University. I also serve as Secretary and Treasurer of the John Carter Brown Library Research Foundation, a separate Rhode Island non-profit corporation associated with Brown University and the John Carter Brown Library through an operating agreement.

2. I am a member of the American Historical Association.

3. Together, the John Carter Brown Library and the John Carter Brown Library Research Foundation (collectively referred to in this declaration as “the Library”) have regularly and for many decades successfully applied for grants from various NEH grant programs. For example, the Library recently received the following grants from NEH:

- a. Fellowship Programs at Independent Research Institutions; and
- b. “Digital Projects for the Public” Discovery grant.

4. I recently learned that NEH terminated several grant programs for which the Library was variously a current applicant, had applied in the past, and would have applied to in

the future had the programs remained in place. These include the following programs: (1) Fellowship Programs at Independent Research Institutions, (2) Research and Development, and (3) Digital Humanities Advancement.

5. The termination of these programs substantially harms the Library's ability to meet the mission of supporting advanced research in its field—the history of the early Americas—through the use of the John Carter Brown Library collections. Additionally, the termination of these programs harms the career development of scholars for whom the NEH long-term fellowship at the John Carter Brown Library was a signal achievement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2025 in Providence, Rhode Island.


Karin Wulf